

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

STRATEGIC ESOP, *et al.*,

Relief Defendants.

CASE NO. 24-cv-40 EAW-MJR

**NOTICE OF MOTION FOR
EXTENSION OF TIME TO
RESPOND TO DEFENDANTS'
CROSS-MOTION REQUESTING AN
ORDER DIRECTING PLAINTIFFS
AND THE RECEIVER TO TAKE
CERTAIN ACTIONS**

MOTION BY

The Consumer Financial Protection
Bureau (CFPB).

RELIEF SOUGHT

An order extending the deadline for the CFPB to respond to the Opposition to the Motion to Set Aside the Preliminary Injunction and Cross-Motion filed on December 19, 2024 by Ryan Sasson, Daniel Blumkin, Albert Ian Behar, Twist Financial, LLC, Duke Enterprises, LLC, and Blaise Investments, LLC. Dkt. 533. Plaintiffs' response is currently due on February 14, 2025, and Plaintiff CFPB respectfully requests an extension until February 28, 2025.

DATE AND TIME

As soon as practicable.

PLACE

Hon. Michael J. Roemer, Magistrate
Judge
United States Courthouse
2 Niagara Square

Buffalo, New York 14202

SUPPORT

Motion for Extension of Time to
Respond to Defendants' Cross-
Motion Requesting an Order
Directing Plaintiffs and the
Receiver to Take Certain Actions.

ANSWERING PAPERS

To be filed on schedule as determined by
the Court. Plaintiff intends to file a reply.

GROUND FOR RELIEF

Local Rule 7.

DATED: February 12, 2025

Respectfully submitted,

Attorneys for Plaintiff
Consumer Financial Protection Bureau

CARA PETERSEN
Principal Deputy Enforcement Director

RICHA SHYAM DASGUPTA
Deputy Enforcement Director

TIMOTHY M. BELSAN
Assistant Litigation Deputy

/s/ Vanessa Buchko

Vanessa Buchko

E-mail: vanessa.buchko@cfpb.gov

Phone: 202-435-9593

Joseph Sanders

E-mail: joseph.sanders@cfpb.gov

Phone: 202-377-9846

1700 G Street, NW

Washington, DC 20552

Facsimile: (202) 435-7722